

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____/

**DECLARATION OF VANESSA BAER-JONES IN SUPPORT OF PLAINTIFFS’
MOTION FOR CLASS CERTIFICATION**

TO THE COURT AND ITS ATTORNEYS OF RECORD:

I, Vanessa Baehr-Jones, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the matters herein and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 293111) and admitted to appear *pro hac vice* in this District.
3. All Plaintiffs have remained committed to exercising good faith and sound judgment in developing and prosecuting this case for over two years and have dedicated significant time sitting for depositions, responding to discovery requests, and reviewing documentary discovery while retaining and working with Class Counsel.

4. The Class Representatives have retained experienced and capable counsel, including myself, founder of Advocates for Survivors of Abuse PC, and my co-counsel, Heather Moore Collins of HMC Civil Rights, PLLC, and class action litigation firm, Erickson Kramer Osborne LLP. Attached as Exhibits 39-41 are the firm resumes of Advocates for Survivors of Abuse PC, HMC Civil Rights, PLLC, and Erickson Kramer Osborne LLP.
5. In or about August 2023, the FBI opened a federal public corruption investigation into JCPD's potential criminal misconduct relating to Williams, which remains ongoing.
6. The records for one of Defendant Toma Sparks' accounts, [REDACTED] [REDACTED] show deposits from unknown sources totaling [REDACTED] [REDACTED] during the alleged conspiracy.
7. Attached hereto as Exhibit 1 is a true and correct copy of the Affidavit of Michael Little.
8. Attached as Exhibit 2 is a true and correct copy of excerpts of B.P.'s deposition transcript.
9. Attached as Exhibit 3 is a true and correct copy of excerpts of Matthew Gryder's deposition transcript.
10. Attached as Exhibit 4, and filed provisionally under seal, is a true and correct redacted copy of B.P.'s rape kit results.
11. Attached as Exhibit 5, and filed provisionally under seal, is a true and correct redacted copy of Williams' raped list.

12. Attached as Exhibit 6, and filed provisionally under seal, is a true and correct redacted copy of the case file for B.P.
13. Attached as Exhibit 7 is a true and correct copy of B.P.'s Audit Trails.
14. Attached as Exhibit 8 is a true and correct copy of Female 2's Audit Trails.
15. Attached as Exhibit 9 is a true and correct of excerpts of Deborah Dunn's deposition transcript.
16. Attached as Exhibit 10, and filed provisionally under seal, is a true and correct copy of Female 2's Case Notes.
17. Attached as Exhibit 11 is a true and correct copy of the search warrant for Sean Williams' apartment, dated September 19, 2020.
18. Attached as Exhibit 12, and filed provisionally under seal, are true and correct copies of photographs taken by JCPD of Sean Williams' blood-covered hands.
19. Attached as Exhibit 13, and filed provisionally under seal, are true and correct copies of photographs taken by JCPD showing video cameras inside of Sean Williams' apartment.
20. Attached as Exhibit 14, and filed provisionally under seal, is a true and correct copy of the September 19, 2020, dispatch log.
21. Attached as Exhibit 15, and filed provisionally under seal, is a true and correct copy of a photograph of a rifle located inside Sean Williams' apartment on September 19, 2020.
22. Attached as Exhibit 16, and filed provisionally under seal, is a true and correct copy of the property receipts of the items seized from Williams.

23. Attached as Exhibit 17 is a true and correct copy of the search warrant for Sean Williams' safe, dated September 23, 2020.
24. Attached as Exhibit 18, and filed provisionally under seal, are true and correct copies of photographs taken by JCPD on September 23, 2020, showing cash and a baby doll from Sean Williams' safe.
25. Attached as Exhibit 19 is a true and correct copy of David Hilton's September 19, 2020, email.
26. Attached as Exhibit 20 is a true and correct copy of the Kateri Dahl Recordings Transcript. This document has been filed publicly in the action *Dahl v. Turner*, 2:22-cv-00072-KAC-JEM.
27. Attached as Exhibit 21, and filed provisionally under seal, is a true and correct copy of Toma Sparks' May 5, 2021, email to Karl Turner.
28. Attached as Exhibit 22, and filed provisionally under seal, is a true and correct copy of the December 3, 2020, Memorandum from Toma Sparks to Kevin Peters.
29. Attached as Exhibit 23, and filed provisionally under seal, is a true and correct copy of Toma Sparks' January 13, 2021, email to Kateri Dahl.
30. Attached as Exhibit 24, and filed provisionally under seal, is a true and correct copy of Michael Little's Affidavit in Support of Search Warrant, dated May 31, 2023.
31. Attached as Exhibit 25, and filed provisionally under seal, is a true and correct copy of excerpts of Steven Finney's deposition transcript. Counsel representing the District Attorney's Office for the First Judicial District has not agreed to de-designate these sections of District Attorney Steven Finney's deposition transcript. Plaintiffs' counsel has met and conferred with Senior Assistant Attorney General Mary Elizabeth

- McCullohs, to request that this transcript be de-designated, but the parties have not yet reached an agreement.
32. Attached as Exhibit 26 is a true and correct copy of excerpts of Brady Higgins' deposition transcript.
33. Attached as Exhibit 27 and filed provisionally under seal, is a true and correct redacted copy of the case file for Female 8.
34. Attached as Exhibit 28 are the audit trails for Female 8.
35. Attached as Exhibit 29 is a true and correct copy of excerpts of Female 4's deposition transcript.
36. Attached as Exhibit 30, and filed provisionally under seal, is a true and correct copy of Johnson City's Response to Plaintiffs' Second Set of Interrogatories and Fifth Requests for Production of Documents. This exhibit contains the names of individual police officers who have been interviewed in an ongoing federal public corruption investigation. Plaintiffs' counsel has requested that Defendant City produce a redacted version of this document that is appropriate for public filing.
37. Attached as Exhibit 31 is a true and correct redacted copy of excerpts from Toma Sparks' Truist bank records.
38. Attached as Exhibit 32 is a true and correct copy of excerpts of Eric Daigle's deposition transcript.
39. Attached as Exhibit 33 is a true and correct copy of the Daigle Report.
40. Attached as Exhibit 34 is a true and correct copy of excerpts of Eric Dougherty's 30(b)(6) deposition transcript.

41. Attached as Exhibit 35 is a true and correct copy of General Order 600.13, Sexually Oriented Crimes.
42. Attached as Exhibit 36 is a true and correct copy of General Order 600.07, Interview & Interrogation.
43. Attached as Exhibit 37 is a true and correct copy of a screengrab from the July 15, 2022, video of Brady Higgins interviewing Female 8 in a room produced with a timestamp of 14:18:14.
44. Attached as Exhibit 38 is a document produced by Defendant City at CITY-0066593 regarding TIBRS.
45. Defendant City has not agreed to de-designate any police reports or case files, even those redacted of all victim and witness personal identifying information, in any ongoing Sean Williams investigations.
46. Plaintiffs have met and conferred with counsel for Defendants regarding the filing of this declaration and the attached Exhibits.

Dated: October 15, 2024

Respectfully submitted,

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

Pro Hac Vice

Advocates for Survivors of Abuse PC

4200 Park Boulevard No. 413

Oakland, CA 94602

(510) 500-9634

vanessa@advocatesforsurvivors.com

/s/ Julie C. Erickson

Julie C. Erickson (California Bar # 293111)

Elizabeth A. Kramer (California Bar # 293129)

Kevin M. Osborne (California Bar #261367)

Pro Hac Vice

Erickson Kramer Osborne LLP

44 Tehama St.

San Francisco, CA 94105

415-635-0631

julie@eko.law

elizabeth@eko.law

kevin@eko.law

/s/ Heather Moore Collins

Heather Moore Collins (# 026099)

Ashley Shoemaker Walter (#037651)

HMC Civil Rights Law, PLLC

7000 Executive Center Dr., Suite 320

Brentwood, TN 37027

615-724-1996

615-691-7019 FAX

heather@hmccivilrights.com

ashley@hmccivilrights.com

Attorneys for Plaintiffs and Proposed Classes

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on October 15, 2024 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 rachel@hbm-lawfirm.com</p> <p>Emily C. Taylor Maria Ashburn WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 etaylor@watsonroach.com mashburn@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey Burch, Porter, & Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com mchrisman@bpjlaw.com</p> <p><i>Attorney to Defendant City of Johnson City, Tennessee</i></p>	<p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law jdowd@fbb.law msutton@fbb.law gpatton@fbb.law</p> <p><i>Counsel for Toma Sparks in his individual Capacity</i></p> <p>Keith H. Grant Laura Beth Rufolo Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 kgrant@rswlaw.com lrufolo@rswlaw.com awells@rswlaw.com</p> <p><i>Counsel for Justin Jenkins and Jeff Legault in their individual capacity</i></p> <p>Daniel H. Rader IV MOORE, RADER & YORK PC 46 North Jefferson Avenue P. O. Box 3347 Cookeville, TN 38501 danny@moorerader.com</p> <p><i>Counsel for Defendant Karl Turner in his individual Capacity</i></p>
--	--

/s/ Vanessa Baehr-Jones
Vanessa Baehr-Jones